

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. ANTON JOSEPH LAZZARO,
a/k/a Tony Lazzaro,
a/k/a Tony, and
2. GISELA CASTRO MEDINA,
a/k/a Gisela Medina,

Defendants.

Case No. 21-cr-173 (PJS/DTS)

**UNITED STATES' BILL
OF PARTICULARS FOR
FORFEITURE OF PROPERTY**

The United States Attorney's Office for the District of Minnesota, by and through Charles J. Kovats, Jr., Acting United Attorney, and Craig R. Baune, Assistant United States Attorney, files the following Bill of Particulars.

As a result of the offenses charged in Counts 1 through 10, the defendants shall forfeit the following property to the United States pursuant to Title 18, United States Code, Section 1594:

- (1) Any property, real or personal, involved in, used or intended to be used to commit or to facilitate the commission of the offenses, and any property traceable to such property; and
- (2) Any property, real or personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offenses, or any property traceable to such property:

The property subject to forfeiture includes, but is not limited to:

- (a) the real property located at 201 11th Street South, #1920, Minneapolis, MN 55402;
- (b) a 2010 Ferrari Convertible, VIN ZFF65LJA9A0173846;
- (c) a Microsoft Windows Surface Pro-1645 Tablet, serial number 005260151452;
- (d) a Black Blackberry cellphone, serial number 1163831917;
- (e) a black Apple iPhone, serial number DNPVH35SHG7l;
- (f) an Alcatel TCL cellphone, serial number 15145008637858;
- (g) a Xiamoi cellphone, serial number 1884828VN00206;
- (h) 4 Thumb Drives seized from 201 11th Street South, #1920, Minneapolis, MN 55402 on December 15, 2020;
- (i) 14 SD Cards seized from 201 11th Street South, #1920, Minneapolis, MN 55402 on December 15, 2020;
- (j) a Silver Dell XPS Laptop, serial number 6KGP9H2/14298070070;
- (k) a Dell Inspiron Laptop, serial number JVMV943/432171725539;
- (l) a gray/black Motorola Moto 35 cellphone, serial number ZY323G7XXF;
- (m) a white/black Motorola One cellphone, IMEI: 352169100855557;
- (n) an LG LM-X210APM cellphone, serial number 001VTYK861266;
- (o) an Apple iPhone model A1662 cellphone seized from 201 11th Street South, #1920, Minneapolis, MN 55402 on December 15, 2020;
- (p) an LG model LM-X210APM cellphone, serial number 809VTFW411651;
- (q) a black/silver Apple iPhone, model A1549, seized from 201 11th Street South, #1920, Minneapolis, MN 55402 on December 15, 2020;
- (r) a Bittium Tough Mobile 2 cellphone with IMEI: 357320100013706;

- (s) a GPS tracker, seized from 201 11th Street South, #1920, Minneapolis, MN 55402 on December 15, 2020;
- (t) a Blackberry cellphone with 32 GB SD Card with IMEI: 015103000107958;
- (u) a Microsoft Windows Surface tablet with charging cord, seized from 201 11th Street South, #1920, Minneapolis, MN 55402 on December 15, 2020;
- (v) an Apple iPhone 11, serial number FK2ZJ2BINT2J;
- (w) an Apple iPad Pro-A1701 with charger, serial number DMPVP02WJ28N;
- (x) an Apple Macbook Air-A2119 with charger, serial number C02D7EUDMNHP; and
- (y) a Google Pixel 4A cellphone, Model G025 with IMEI 358118100229242.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

Dated: December 13, 2021

CHARLES J. KOVATS, JR.
Acting United States Attorney

s/Craig Baune
BY: CRAIG R. BAUNE
Assistant United States Attorney
Attorney No. 331727
600 United States Courthouse
300 South Fourth Street
Minneapolis, MN 55415
612-664-5600
Craig.Baune@usdoj.gov